NPDES Compliance Inspection
Hot Springs Lagoons

Date: July 16, 2014

Permit No.: MT0020591

Contacts: Ruben Loberg and Sierra Lazaro

Address: PO Box 669, Hot Springs, MT 59845; (406) 741-2531

Inspectors: David Rise, US EPA; Clint Folden, CSKT Environmental Protection Division.

Site Description:
The facility is a multi-cell, aerated, wastewater treatment lagoon serving the Town of Hot Springs in Sanders County, Montana and is located at 47°36'48" north latitude and 114°38'55" west longitude. The site is located within the exterior boundary of the Flathead Reservation and thus is in Indian Country as defined in 18 U.S.C. § 1151. The facility chlorinates the treated effluent, which discharges to a ditch leading to Hot Springs Creek.

Inspection:
Mr. Folden and I arrived at the Town of Hot Springs' City Hall where we introduced ourselves and explained why we were there. The City staff had public works staff, Mr. Ruben Loberg and Ms. Sierra Lazaro, come to the City Hall. On their arrival I presented my credentials and began the inspection with a brief opening conference, explaining the inspection procedure to Mr. Loberg and Ms. Lazaro.

The first part of the inspection was reviewing the permit-required records and discussing operation of the wastewater collection and treatment system with Mr. Loberg and Ms. Lazaro. The permit files contained an unsigned copy of the draft permit. I told Mr. Loberg I would send a copy of the final, signed permit for the files. All discharge monitoring reports and laboratory analytical results for at least the past three years were in the files as required by the permit. Ms. Lazaro said both of them work on the lagoons and collection system. She checks on the aerators and chlorine daily and also does general maintenance such as skimming the lagoon ponds as needed, while Mr. Loberg does the monthly sample collection and daily visual monitoring for oil and grease, foam, etcetera. Mr. Loberg said he collects the monthly monitoring samples at the beginning of the month to allow time to resample if needed.

The Town changed the chlorine disinfection from chlorine gas to chlorine tablets in 2013. Chlorine tablets are dissolved in solution, which is injected into the lagoon effluent at the same location the chlorine gas was injected. Chlorine monitoring is done on site with a digital readout colorimeter. Mr. Loberg said the Town has the sanitary sewer overflow situation under control now. They have purchased a camera system to look at the insides of the sewer lines and fix the lines as problems are found. The Town also has a jetter to clean the sewer lines and has a regular schedule to jet the lines. They are also working with the Morrison-Maierle engineering firm and pursuing funding to upgrade water and sewer lines. One problem they want to address is reducing inflow-infiltration to the sewer lines in some specific areas of Town. Mr. Loberg asked a question about permit requirements for percent removal of five-day biochemical oxygen

demand and total suspended solids. I said I would verify the permit requirements and send that to him with the final report. On concluding the records review and system discussion we went to the lagoons to do a site review.

At the lagoons Mr. Loberg and Ms. Lazaro showed us and explained the new chlorine system. Ms. Lazaro also showed us the daily activity log they each kept to document their work activities for the Mayor and Town Council. She said the lagoon inspection activities were logged on that form. I told them the daily activity log was fine for logging the permit required tasks and to ensure they were kept for the required three year records retention period. I took two photographs of the new chlorine structure and one overview photo of the lagoons during the inspection. After the lagoon review Mr. Folden and I departed the site.

David Rise, Inspector
NPDES Program

September 3, 2014

Photo 1:
Taken by David Rise, July16, 2014.

Overview of the Hots Springs lagoons, looking west from near the chlorine building.

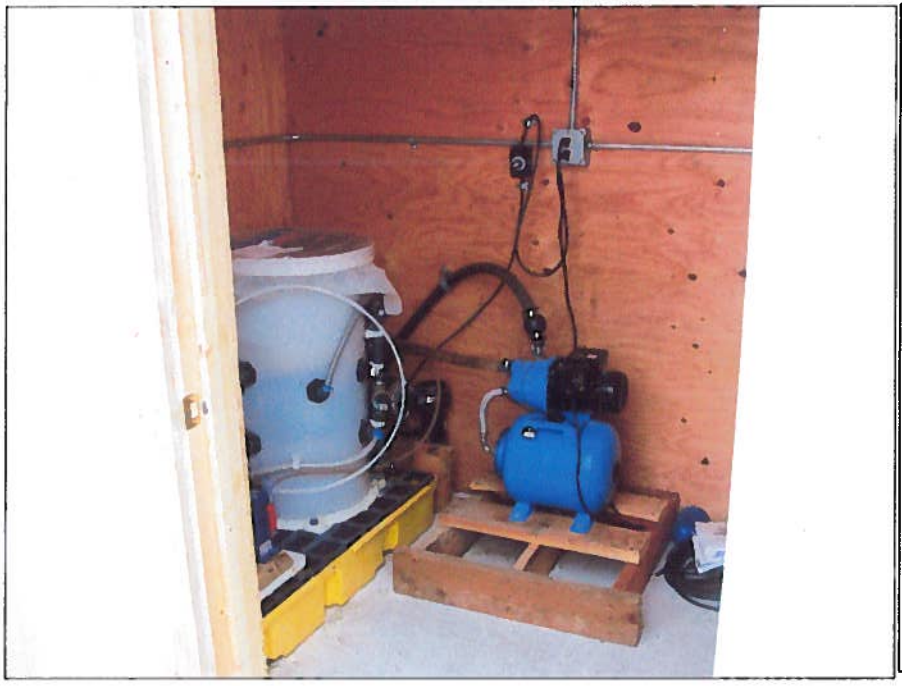

Photo 2:
Taken by David Rise, July 16, 2014.

Looking into the new chlorine building at the Hot Springs lagoons. Chlorine tank and injector pump.

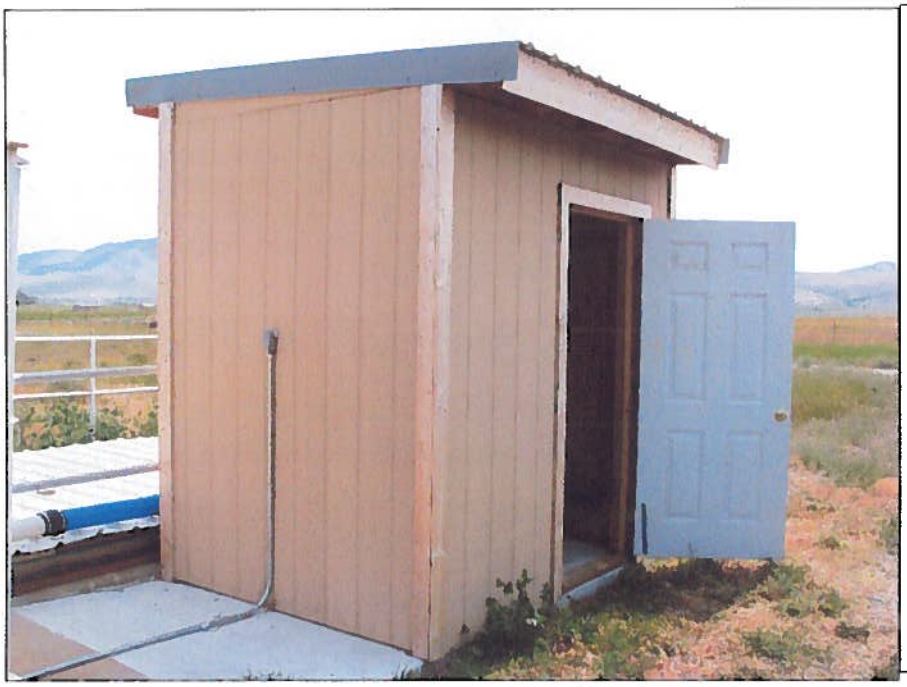

Photo 3:
Taken by David Rise, July 16, 2014.

New chlorine building at Hot Springs lagoon system. The chlorine contact chamber is visible behind the building on the left side of the photo.